

### REMARKS/ARGUMENTS

The drawings have been objected to under 37 CFR 1.83(a). Specifically, it is the Examiner's position that the "abandonment and recovery crane" is not shown. The objection is respectfully traversed. The abandonment and recovery claim is clearly visible as item 8 in Figs. 1(a) and 1(b). Accordingly, it is respectfully submitted that no new drawings are required and it is not necessary that that feature be cancelled from the claims.

Claims 8 and 12 were rejected for reasons set forth in paragraphs 2, 3 and 4 of the Office Action, appropriate correction has been made and the errors are regretted.

With respect the art rejections, Claims 1-12 stand rejected under 35 U.S.C. § 102(a) as being anticipated by U. S. Publication 2003/0091395 (Stockstill). The rejection is respectfully traversed. Claim 1 recites that the hold-off clamp is mounted on the vessel independently of the lay tower. While the Examiner takes the position with respect to Stockstill that the clamp (86) is mounted independently of the tower (52) on a trolley comprising a beam and two rails (87, 88), it is respectfully submitted that the Examiner has misconstrued the teachings of Stockstill. In particular, with reference to Figs. 12-19 of Stockstill and particularly Figs. 13 and 14, it appears that the rails 87, 88 are mounted on the tower and accordingly not independently of the tower on the vessel. In this regard, paragraphs [0125]-[0127] are the most pertinent portions of the Stockstill specification and those paragraphs are silent as to how the rails 87, 88 are mounted. Again, from Figs. 13 and 14, it seems abundantly clear that the rails

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are mounted on the tower 52. In paragraph [0136] in discussing Figs. 16, it is stated that the rails 87, 88 are attached to the vessel hull 45 at its stern position 47; however, there is no teaching to suggest that this is intended to disclose the that the hold-off clamp mounted independently of the lay tower 52; all of the other disclosure regarding the relationship of the rails, the hold-off clamp and the tower clearly point to the rails being mounted indirectly on the stern portion of the vessel by virtue of being mounted on the tower 52. Clearly, Claims 1-12 are not anticipated by Stockstill.

With respect to Claim 3, it is the Examiner's position that Stockstill discloses a moon pool (18) that defines a working space (Fig. 4) and the opposite sides of the moon pool are equivalent to outriggers. At the outset, it is to be noted that Claim 1 is dependent upon Claim 3 and further limits Claim 1 and, accordingly, for that reason alone, is not anticipated by Stockstill. Moreover, the Examiner's position merely confirms Applicant's interpretation of Stockstill (see paragraph [0094]). The components mentioned in that paragraph, including the hold-off claim 24, are carried on the tower – not independently of the tower. Additionally, in Figs. 12-19, Stockstill clearly shows outriggers but, in fact, does not mount the hold-off clamp on a trolley between them. The Examiner is attempting to reconfigure Stockstill in accordance with Applicant's claims.

With respect to Claim 6, vis-à-vis X-Y movement, the Examiner's position is that such movement is disclosed by the fore and aft movement of the clamp enabled by cylinders 121-123. In fact, the cylinders 121-123 simply act to close the clamp but have no ability to move the claim off the lay axis.

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Clearly, Claim 6 is not anticipated by Stockstill and, in any event, is dependent on Claim 1 which has been shown to be patentable over Stockstill.

It should also be noted that Claim 2 has been amended to state that the beam on the trolley which runs on rails and spans the laying axis is operative to move the hold-off claim in a direction transverse to the length of the beam. Stockstill clearly does not disclose this feature.

Lastly, with respect to new Claim 13, Stockstill does not disclose a "trolley on trolley" arrangement to permit the hold-off clamp to move in a direction parallel to the length of the beam. This highlights Applicant's inventive feature of two dimensional movement and the mounting of the trolley between outriggers of the vessel.

Claim 8, depends upon Claim 1, and accordingly, is patentable over Stockstill.

Applicant has also considered Fikes, et al. (2002/0074125). For many of the reasons discussed above with respect to Stockstill, the Fikes reference is even less applicable.

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In view of the foregoing amendments and remarks, it is respectfully submitted that all claims are in condition for allowance, which is hereby earnestly solicited and respectfully requested.

Respectfully submitted,

/ C. James Bushman /

C. James Bushman  
Reg. No. 24,810

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BROWNING BUSHMAN P.C.  
5851 San Felipe, Suite 975  
Houston, Texas 77057-5771  
Tel.: (713) 266-5593  
Fax: (713) 266-5169

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